

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

MATCH GROUP, LLC

Plaintiff,

v.

BUMBLE TRADING INC. and
BUMBLE HOLDING, LTD.,

Defendants.

No. 6:18-cv-00080-ADA

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT OF DISPUTED CLAIM TERMS

Pursuant to the Court's Scheduling Order, Dkt. 73, Plaintiff Match Group, LLC and Defendants Bumble Trading Inc. and Bumble Holding, Ltd. submit this Joint Claim Construction Statement of Disputed Claim Terms for the asserted claims of U.S. Patent No. 9,733,811 (the "'811 Patent"), U.S. Patent 9,959,023 (the "'023 Patent"), and U.S. Patent No. 10,203,854 (the "'854 Patent").

DISPUTED CLAIM CONSTRUCTIONS FOR MATCH GROUP, LLC V. BUMBLE TRADING INC., CASE NO. 18-CV-080-ADA

1. Disputed Term No. 1 -- “Graphical Representation”¹;

Patent Claims	Match’s Construction²	Bumble’s Construction³
’811 Patent, claims 1, 4, and 7	Pictorial portrayal Pictorial portrayal of a [first, second, third, etc.] potential match	summary of information [displayed on a graphical user interface]
’023 Patent, claims 1, 2, 3, and 5	Pictorial portrayal of a first [second] online dating profile associated with a first [second] user	summary of information [displayed on a graphical user interface] representing a [first, second, third, etc.] potential match
’854 Patent, claims 1, 4, 7, and 10	Pictorial portrayal of a first item of information Pictorial portrayal of the first [second] user.	summary of information [displayed on a graphical user interface] representing a first [second] online dating profile associated with a first [second] user summary of information [displayed on a graphical user interface] representing a first item of information summary of information [displayed on a graphical user interface] representing the first [second] user.

¹ The parties have also proposed constructions for the broader phrases “a graphical representation of a [first, second, third, etc.] potential match”, “a graphical representation of a [first, second] online dating profile associated with a [first, second] user”, “a graphical representation of a [first, second] item of information, and “a graphical representation of the [first, second] user.”

² Match also proposed an alternative phrasing of this construction as “portrayal, including some pictorial component, of”

³ Where the claims elements that contain the term “graphical representation” make clear that the “graphical representation” is displayed on a graphical user interface, the bracketed term [displayed on a graphical user interface] may be omitted from the construction inserted into the claim language.

2. **Disputed Term No. 2 -- “Without Allowing Communication”**

Patent Claims	Match’s Construction	Bumble’s Construction⁴
’854 patent, claims 1, 3, 4, 6, 7, and 10	Plain and ordinary meaning; no construction necessary	An affirmative act to ensure no communication between two users

3. **Disputed Term No. 3 -- “Preventing Communication”**

Patent Claims	Match’s Construction	Bumble’s Construction⁵
’811 Patent, claims 1, 4, and 7	Plain and ordinary meaning; no construction necessary	An affirmative act to ensure no communication between two users

4. **Disputed Term No. 4 -- “Social Networking Platform”**

Patent Claims	Match’s Construction	Bumble’s Construction
’811 Patent, claims 1, 4, and 7 ’854 Patent, claims 2, 5, 8, and 11	Plain and ordinary meaning; no construction necessary	Social networking platform independent of the system for profile matching

⁴ Bumble also proposed the alternative construction of the broader terms “without allowing communication between the first user and the third [fourth] user” and “without allowing the first user to communicate with the third user” as “upon performing an affirmative act to ensure no communication between the first user and the third [fourth] user.”

⁵ Bumble also proposed the alternative construction of the broader term “prevent[ing] communication between the first and the third [fourth] user” as “perform[ing] an affirmative act to ensure no communication between the first and the third [fourth] user.”

5. Disputed Term No. 5 -- “Associated”

Patent Claims	Match’s Construction	Bumble’s Construction
’811 patent, claims 1, 3, 4, 6, and 7 ’023 patent, claims 1-6 ’854 patent, claims 1, 2, 4, 5, 7, 8, 10, and 11	Plain and ordinary meaning; no construction necessary	Indefinite

6. Disputed Term No. 6 -- “text area”

Patent Claims	Match’s Construction	Bumble’s Construction
’811 patent, claims 2, 5, and 8	Not indefinite. “The text area” in claims 2 and 5 is an obvious typographical error that is subject to judicial correction. “The text area” should read “a text area.” Otherwise, plain and ordinary meaning.	Indefinite

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Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel registered as Filing Users on this 29th day of May, 2019.

/s/ Bradley W. Caldwell
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